

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

Case No. 2:13-cv-00486-GLF-MRA
Judge Gregory L. Frost

Amy Chanson and Roy Chanson have received the Plaintiff's motion for leave to file sur-reply in opposition to the motion to dismiss. We are responding to the allegations made by the Randazza Group. We are residents of the State of New Jersey. We cannot afford a lawyer and we are representing ourselves. All of the allegations made by Mr. Green and the Randazza Group are not true. We did not have conversations with Ronald D. Green. At no time did we discuss the websites (See Decl. of Ronald Green, Exhibit A) or any other involvement. Mr. Green insists on showing records of his alleged telephone calls (note that the identified numbers are not our phone numbers). We did not participate in any calls he made to the phone number he sites.

We were not aware of the websites until the recent lawsuits which includes the one lawsuit which settled in May of 2013 (which was settled with prejudice). The Randazza Group continues to misquote us on this and other court documents they have sent to the court. While our son, Eric may have spoken to Mr. Green, we did not speak with Mr. Green. We did however, speak to his colleague, Mark Randazza. Amy Chanson did have a conversation with Randazza during which time she was threatened by him because his client, wanted to buy the website from our son. When Mr. Randazza threatened our son Eric, our son felt terrified by Mr. Randazza's verbal assault and he put Amy Chanson on the phone. At which time, Randazza threatened Amy as well. The Chansons are not accustomed to getting threatening phone calls late at night and Randazza's verbal assault on Amy and her son was so shocking she did not believe that he was a real lawyer. What lawyer makes calls late at night and threatens people? This is another example of Randazza's tactics.

When the sale of the website from our son, Eric (who is 25 years old) did not go through, they included Amy and Roy Chanson in their lawsuit in Las Vegas. Mr. Randazza mentions our attorney in that case, Ryan Gile and supplies emails from him.(See plaintiff's exhibits B & C) Please note that Mr. Randazza has blacked out the bottom portion of the emails which deletes

his response to Ryan Gile. Mr. Gile asks what facts they have about our involvement. Mr. Randazza and Group never provided any relevant facts to Mr. Gile. The mention of these emails from the prior lawsuit are a violation of FRE 408. Please note the communication clause at the end of the email clearly states it is privileged information not to be disseminated. Clearly, Randazza's decision to include these emails in this case are still another example of the unethical behavior of Mr. Randazza and group.

Mr. Randazza includes a declaration of Laura M. Tucker about a witnessed telephone call between Randazza and his group and Amy Chanson.

In fact, this was the second time Randazza called Amy Chanson about this lawsuit. It is our understanding that the plaintiff's attorney is not to contact us.


When he did call, I (Amy) told him he was not supposed to call me. Randazza said to me. (Amy), "Don't you want to settle this?"

Given Randazza's history of threatening and misquoting us, I (Amy) said, "I will not speak to you unless I have AN attorney present. I, (Amy) never said "I have an attorney". (We can provide phone records of the calls that Randazza made to Amy). He also called Roy Chanson on several occasions but Roy refused to take his calls. We would not discuss the lawsuit with Randazza and his group because they have not acted ethically and honestly and we do not trust them. We have asked the court to impose sanctions on Randazza.


Mr. Randazza speaks of teachable moments for The Chansons. He is correct this has been a teachable moment for the Chansons. In over 30 years of marriage, being hardworking law abiding citizens we simply cannot understand how this lawyer who is an officer of the court who is bound to the Code of Professional Responsibility, could threaten, lie and file unfounded lawsuits.

We respectfully ask the court for two actions: 1) Dismiss this case and 2) Impose sanctions on Mark Randazza. We are not vindictive people. We have faith in God and everything that is good about this country.

Respectfully submitted,



Roy Chanson
Dated: September 20th, 2013



Amy Chanson
Dated: September 20th, 2013.

Pursuant to the Federal Rules of Civil Procedure 5(b), I hereby certify that the foregoing document was served upon all other parties via U.S. mail:

/s/ Marc J. Randazza
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/s/ H. Louis Sirkin
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Dated: September 20th, 2013.